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April 24, 2007

BY E-FILE

The Honorable Gregory M. Sleet
U.S. District Court for the District of Delaware
U.S. Courthouse
844 N. King Street
Lockbox 19
Wilmington, DE 19801

Re: Finjan Software Ltd. v. Secure Computing Corporation, et al.,
D. Del., C.A. No. 06-369-GMS

Dear Judge Sleet:

In anticipation of the discovery teleconference scheduled for April 26, 2007 at 3:00 p.m. EST in the above-captioned matter, the parties jointly submit the following items to be presented to the Court:

Plaintiff's Issues:

- Plaintiff seeks access to the entire source code for specifically identified alleged infringing products and the ability to print relevant sections of source code necessary for proving infringement.
- Defendants' production of documents in response to Finjan's First Set of Requests for Production of Documents and a date certain for the production of such documents.

Defendants' Issues:

- Defendants' proposal for inspection of portions of source code that perform the functions identified by the other side as embodiments of asserted claims.
- Motion for new schedule to address four new patents added to lawsuit.
- Service of Plaintiff's inventors, including Shlomo Touboul.

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Respectfully,

A handwritten signature in black ink, appearing to read "Philip A. Rovner", with a large, sweeping flourish above the name.

Philip A. Rovner
provner@potteranderson.com

PAR/mes/791273

cc: Frederick L. Cottrell, Esq. (by E-file, E-mail and hand delivery)